

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GWG HOLDINGS, INC., *et al.*¹

Debtors.

MICHAEL I. GOLDBERG, as Trustee of the GWG
LITIGATION TRUST,

Plaintiff,

v.

BRADLEY K. HEPPNER, individually and in his
capacity as Trustee of THE BRADLEY K.
HEPPNER FAMILY TRUST, THE HEPPNER
FAMILY HOME TRUST, THE HIGHLAND
BUSINESS HOLDINGS TRUST, and THE
HIGHLAND INVESTMENT HOLDINGS TRUST;
BENEFICIENT CAPITAL COMPANY, L.L.C.;
BENEFICIENT CAPITAL COMPANY II, L.L.C.;
BENEFICIENT COMPANY HOLDINGS, L.P.;
BENEFICIENT HOLDINGS, INC.;
BENEFICIENT MANAGEMENT, L.L.C.;
BRADLEY CAPITAL COMPANY, L.L.C.;
PETER T. CANGANY, JR.; DAVID F.
CHAVENSON; CT RISK MANAGEMENT,
L.L.C.; ELMWOOD BRADLEY OAKS, L.P.;
TIMOTHY L. EVANS; FUNDING TRUST
MANAGEMENT, L.L.C.; TIMOTHY B.
HARMON, in his capacity as Trustee of

Chapter 11

Case No. 22-90032 (MI) (Jointly
Administered)

Adv. Pro. No. 24-03090 (MI)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

THE HIGHLAND INVESTMENT HOLDINGS TRUST; HCLP CREDIT COMPANY, L.L.C.; HCLP NOMINEES, L.L.C.; THOMAS O. HICKS; HIGHLAND CONSOLIDATED, L.P.; MURRAY T. HOLLAND; LIQUIDTRUST MANAGEMENT, L.L.C.; RESEARCH RANCH OPERATING COMPANY, L.L.C.; BRUCE W. SCHNITZER; THE BENEFICIENT COMPANY GROUP, L.P.; THE BENEFICIENT COMPANY GROUP (USA), L.L.C.; and JOHN STAHL, in his capacity as Trustee of THE LT-1 COLLECTIVE COLLATERAL TRUST, THE LT-2 COLLECTIVE COLLATERAL TRUST, THE LT-3 COLLECTIVE COLLATERAL TRUST, THE LT-4 COLLECTIVE COLLATERAL TRUST, THE LT-5 COLLECTIVE COLLATERAL TRUST, THE LT-6 COLLECTIVE COLLATERAL TRUST, THE LT-7 COLLECTIVE COLLATERAL TRUST, THE LT-8 COLLECTIVE COLLATERAL TRUST, THE LT-9 COLLECTIVE COLLATERAL TRUST, THE LT-1 LIQUID TRUST, THE LT-2 LIQUID TRUST, THE LT-5 LIQUID TRUST, THE LT-7 LIQUID TRUST, THE LT-8 LIQUID TRUST, and THE LT-9 LIQUID TRUST, Defendants.

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned is counsel for Defendants LiquidTrust Management, L.L.C., Funding Trust Management, L.L.C., and Beneficient Fiduciary Financial, L.L.C., in its capacity as Trustee of The Collective Collateral Trust I, The Collective Collateral Trust II, The Collective Collateral Trust III, The Collective Collateral Trust IV, The Collective Collateral Trust V, The Collective Collateral Trust VI, The Collective Collateral Trust VII, and The Collective Collateral Trust VIII (collectively, the “**Collective Collateral Trusts**”), and of The LT-1 Liquid Trust, The LT-2 Liquid Trust, The LT-5 Liquid Trust, The LT-7 Liquid Trust, The

LT-8 Liquid Trust, and The LT-9 Liquid Trust (collectively, the “**Liquid Trusts**”),² in the above-referenced adversary case and hereby enters its appearance and requests copies of all notices and pleadings. All such notices should be addressed as follows:

Allen Overy Shearman Sterling US LLP

R. Thaddeus Behrens
Texas Bar No. 24029440
thad.behrens@aoshearman.com
Daniel H. Gold
Texas Bar No. 24053230
daniel.gold@aoshearman.com
Ian E. Roberts
Texas Bar No. 24056217
ian.roberts@aoshearman.com
Matthew A. McGee
Texas Bar No. 24062527
matt.mcgee@aoshearman.com
William D. Marsh
Texas Bar No. 24092762
billy.marsh@aoshearman.com
The Link at Uptown
2601 Olive Street, 17th Floor
Dallas, TX 75201
Tel.: (214) 271-5777

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, pleading, or request, whether formal or informal written or oral, and whether transmitted or conveyed by mail,

² Following the resignation of John Stahl (who was named as a defendant in the Complaint in his capacity as the trustee of certain trusts), Beneficient Fiduciary Financial, L.L.C. (“**BFF**”) has been named as the trustee of the Collective Collateral Trusts and the Liquid Trusts and is responding to the Complaint on behalf of those trusts. The Collective Collateral Trusts are misnamed in the Complaint as the LT-1 Collective Collateral Trust though the LT-8 Collective Collateral Trust. *See* Compl. ¶ 68. This Notice of Appearance and Request for Notice contains the correct names for the Collective Collateral Trusts. There is no trust named the LT-9 Collective Collateral Trust or The Collective Collateral Trust IX, and thus, no appearance is being made on behalf of BFF in a capacity as Trustee of the LT-9 Collective Collateral Trust or the Collective Collateral Trust IX.

hand delivery, telephone, facsimile, or otherwise filed or made with regard to the referenced case and the proceedings.

PLEASE TAKE FURTHER NOTICE that the undersigned counsel consent to service via email.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notice nor any later appearances, pleadings, proof of claim, claim or suit, or other writings, or conduct shall constitute a waiver of: (i) the right to have final orders or a judgment in any matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any case, controversy, or proceeding, whether or not such matters are designated as involving legal or private rights or as core proceedings, and whether or not such jury trial is pursuant to statute or the U.S. Constitution; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice; (v) an election of remedy; and (vi) any other rights, claims, actions, defenses, setoffs or recoupments, as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: November 4, 2024

Respectfully submitted,

ALLEN OVERY SHEARMAN STERLING US LLP

By: /s/ R. Thaddeus Behrens

R. Thaddeus Behrens

Texas Bar No. 24029440

thad.behrens@aoshearman.com

Daniel H. Gold

Texas Bar No. 24053230

daniel.gold@aoshearman.com

Ian E. Roberts

Texas Bar No. 24056217

ian.roberts@aoshearman.com

Matthew A. McGee

Texas Bar No. 24062527

matt.mcgee@aoshearman.com

William D. Marsh

Texas Bar No. 24092762

billy.marsh@aoshearman.com

The Link at Uptown

2601 Olive Street, 17th Floor

Dallas, TX 75201

Tel.: (214) 271-5777

*Attorneys for LiquidTrust Management, L.L.C.,
Funding Trust Management, L.L.C., and Beneficient
Fiduciary Financial, L.L.C. in its capacity as Trustee
of The Collective Collateral Trust I, The Collective
Collateral Trust II, The Collective Collateral Trust III,
The Collective Collateral Trust IV, The Collective
Collateral Trust V, The Collective Collateral Trust VI,
The Collective Collateral Trust VII, The Collective
Collateral Trust VIII, The LT-1 Liquid Trust, The LT-2
Liquid Trust, The LT-5 Liquid Trust, The LT-7 Liquid
Trust, The LT-8 Liquid Trust, and The LT-9 Liquid
Trust*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 4, 2024, the foregoing was served on all counsel of record in compliance with the Federal Rules of Civil Procedure.

/s/ R. Thaddeus Behrens

R. Thaddeus Behrens